BENJAMIN D. HARGROVE

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ATTORNEY FOR PLAINTIFF UNITED STATES OF AMERICA

DEC 3 0 2022

Clerk, U.S. District Court District Of Montana Billings

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

HOSSEIN CRISTIANO LUIGI BORHAN,

Defendant.

CR 22-153-BLG- SPW

INFORMATION

RECEIPT OF CHILD PORNOGRAPHY Title 18 U.S.C. §§ 2252(a)(2) and (b)(1) (Penalty: Mandatory minimum five years to 20 years imprisonment, \$250,000 fine, \$5,000 special assessment, and five years to lifetime supervised release)

FORFEITURE Title 18 U.S.C. § 2253(a)

THE UNITED STATES ATTORNEY CHARGES:

That on or about August 21, 2021 through on or about April 9, 2022 at Colstrip, in Rosebud County, in the State and District of Montana and elsewhere, the defendant, HOSSEIN CRISTIANO LUIGI BORHAN, knowingly received any visual depiction, that is digital images and video files, that had been shipped in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

FORFEITURE ALLEGATION

As a result of the commission of the crime described above, and upon his conviction, the defendant, HOSSEIN CRISTIANO LUIGI BORHAN, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a), all right, title and interest in property that represents property used to commit the offense, that is,

• a black Apple iPhone 11 Pro Max, Serial Number G6TCK03VN70H

BENJAMÍN D. HARGROVE

Assistant United States Attorney

JESSE A. LASLOVICH

United States Attorney

CYNDEE L. PETERSON

Cominal Chief Assistant U.S. Attorney